

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

UNITED STATES OF AMERICA,

Plaintiff,

v.

SALVADOR MARTINEZ-TORRES,

Defendant.

Criminal Complaint No. 06- *37m-2-MPT*

**MOTION FOR DETENTION HEARING**

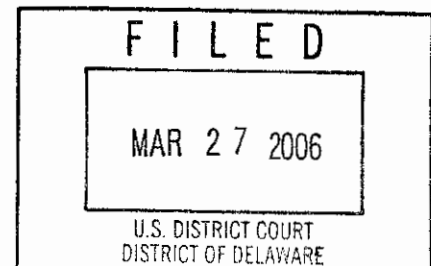
**NOW COMES** the United States and moves for the pretrial detention of the defendant, SALVADOR MARTINEZ-TORRES, pursuant to 18 U.S.C. § 3142(e) and (f). In support of the motion, the United States alleges the following:

1. **Eligibility of Case.** This case is eligible for a detention order because the case involves (**check all that apply**):

- ☐ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☒ 10+ year drug offense
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk defendant will flee
- ☐ Serious risk obstruction of justice

2. **Reason For Detention.** The court should detain defendant because there are no conditions of release which will reasonably assure (**check one or both**):

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community



3. **Rebuttable Presumption**. The United States **will** invoke the rebuttable presumption against defendant under § 3142(e). (If yes) The presumption applies because (check one or both):

  X   Probable cause to believe defendant committed 10+ year drug offense or firearms offense, 18 U.S.C. § 924(c)

       Previous conviction for "eligible" offense committed while on pretrial bond

4. **Time For Detention Hearing**. The United States requests the court conduct the detention hearing,

       At first appearance

  X   After continuance of   3   days (not more than 3).

Respectfully submitted,

COLM F. CONNOLLY  
United States Attorney

Date: March 27, 2006

BY:

  
Adam Safwat  
Assistant United States Attorney